

1 LINER FREEDMAN TAITELMAN + COOLEY, LLP
2 Bryan J. Freedman (SBN 151990)
3 bfreedman@lftcllp.com
4 Ellyn S. Garofalo (SBN 158795)
5 egarofalo@lftcllp.com
6 Amir Kaltgrad (SBN 252399)
7 akaltgrad@lftcllp.com
8 1801 Century Park West, 5th Floor
9 Los Angeles, California 90067
10 Telephone: (310) 201-0005
11 Facsimile: (310) 201-0045

12 *Attorneys for Respondents Tera Hanks, Ashmi Elizabeth ang, Ahmed Musiol, Mitz
13 Toskovic, AJ Marbory, Jennifer Benson, Shekinah Reese, and Jarriesse Blackmon*

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 BLAKE LIVELY,

17 Case No.: 2:25-mc-00055

18 *Movant,*

19 v.

20 TERA HANKS, ASHMI ELIZABETH
21 ANG, AHMED MUSIOL, MITZ
22 TOSKOVIC, AJ MARBORY,
23 JENNIFER BENSON, SHEKINAH
24 REESE, AND JARRIESSE
25 BLACKMON,

26 **DECLARATION OF SUMMER E.
27 BENSON IN SUPPORT OF
28 RESPONDENTS' POSITION IN
THE JOINT STIPULATION IN
OPPOSITION TO MOVANT
BLAKE LIVELY'S MOTION TO
COMPEL COMPLIANCE WITH
THIRD-PARTY SUBPOENAS**

29 *Respondents.*

30

31

32

33

34

35

36

37

38

39

40

DECLARATION OF SUMMER E. BENSON

I, Summer E. Benson, declare as follows:

3 1. I am an attorney at law licensed to practice in the State of California
4 and admitted before this Court. I am an attorney with the law firm of Liner
5 Freedman Taitelman + Cooley, LLP and counsel of record for Respondents Tera
6 Hanks, Mitz Toskovic, Ahmed Musiol, Ashmi Elizabeth Dang, Jariesse Blackmon,
7 AJ Marbory, and Jennifer Benson (collectively, the “Wayfarer Third Parties”) in
8 this action. I submit this declaration in support of the Wayfarer Third Parties’
9 Position in the Joint Stipulation Regarding Movant Blake Lively’s (“Lively”)
10 Motion to Compel Discovery (the “Motion”).

11 2. Attached hereto as Exhibit 1 is a true and correct copy of a letter
12 submitted to the United States District Court for the Southern District of New York
13 by the Wayfarer Third Parties on or about June 13, 2025.

14 3. Attached hereto as Exhibit 2 is a true and correct copy of email
15 correspondence between counsel for the Wayfarer Third Parties and counsel for
16 Lively from June 6 to 13, 2025.

18 I declare under penalty of perjury that the foregoing is true and correct to
19 the best of my knowledge and belief.


Summer E. Benson